

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA)	CRIMINAL No.: 8:20-cr-00452-DCC
)	
vs.)	
)	
JOHN TOWERY,)	MOTION FOR MODIFICATION
Defendant.)	OF CONDITIONS OF RELEASE
<hr style="border: 0.5px solid black;"/>)	

NOW COMES the Defendant, John Towery, by and through his undersigned counsel, requesting a modification of his bond, pursuant to 18 U.S.C. §3142. This Court granted John Towery a \$25,000.00 unsecure bond, on May 3, 2021 (ECF No. 250). His supervision is monitored by the United States Probation Office in the United States District Court for the District of South Carolina.

The terms and conditions of his release include home detention, GPS monitoring and special conditions associated with the charge. Mr. Towery and his wife own and run a horse farm on their property located in Westminster, South Carolina. Mr. Towery is currently on home detention which does not enable him to leave his residence to tend to his animals or property. Mr. Towery has complied with the terms and conditions of his release and bond. Mr. Towery would now respectfully request that his bond conditions be modified to remove the home detention restriction with all the other bond conditions remaining in effect.

The undersigned attorney and counsel of record does hereby certify that he conferred with Carrie Fisher Sherard, Assistant United States Attorney, and she has advised that she does not oppose the relief requested in this motion for the removal of the home detention condition. The

undersigned counsel has also conferred with U.S. Probation Officer, Cornelius Sterling, who has advised that he does object to the relief requested in this motion.

For the foregoing reasons, John Towery would respectfully request a hearing for the modification of his bond and conditions of his release to remove the home detention restriction.

Respectfully submitted,

RAME CAMPBELL LAW FIRM, LLC

s/ Rame L. Campbell

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June 23, 2021

Anderson, South Carolina